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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

ELVIA CURIEL-RUTH, on behalf of himself  
and all others similarly situated

Plaintiff,

v.

ROBINHOOD SECURITIES, LLC;  
ROBINHOOD FINANCIAL, LLC;  
ROBINHOOD MARKETS, INC.;  
CHARLES SCHWAB & CO. INC.;  
CHARLES SCHWAB CORPORATION;  
TD AMERITRADE, INC.;  
WEBULL FINANCIAL LLC;  
E\*TRADE FINANCIAL CORPORATION;  
INTERACTIVE BROKERS LLC;  
CITADEL ENTERPRISE AMERICAS, LLC;  
MELVIN CAPITAL MANAGEMENT LP,

Defendants.

Case No.: 4:21-cv-00829-HSG

**JOINT STIPULATION TO EXTEND  
DEADLINE TO MOVE OR  
OTHERWISE RESPOND TO  
PLAINTIFF'S COMPLAINT**

1 Plaintiff Elvia Curiel-Ruth (“Plaintiff”) and undersigned Defendants (collectively,  
2 “Defendants”, and together with Plaintiff, the “Parties”), hereby stipulate and agree as follows:

3 WHEREAS, Plaintiff filed a Complaint on February 2, 2021 (Dkt. No. 1);

4 WHEREAS, Defendants’ deadline to move or otherwise respond to the Complaint is  
5 currently April 5, 2021;

6 WHEREAS, on February 5, 2021, the plaintiffs in *Cheng et al v. Ally Financial Inc. et al*, 21-  
7 cv-00781 (N.D. Cal.), filed a Motion for Transfer of Actions to the Northern District of California  
8 Pursuant to 28 U.S.C. § 1407 for Coordinated or Consolidated Pretrial Proceedings (“Motion”) with  
9 the Judicial Panel on Multidistrict Litigation (“Panel”), and included this action on the schedule of  
10 actions requested to be centralized;

11 WHEREAS, on February 9, 2021, the Panel accepted the Motion for filing as *In re January*  
12 *2021 Short Squeeze Trading Litigation* (MDL No. 2989) and ordered an accelerated briefing  
13 schedule;

14 WHEREAS, a hearing on the Motion is scheduled for March 25, 2021;

15 WHEREAS, the Parties want the action to proceed in an orderly and efficient manner;

16 WHEREAS, this is the first extension that has been requested and the Parties have not  
17 obtained any previous extensions;

18 WHEREAS, Civil Local Rule 6-1 permits the Parties to “stipulate in writing, without a Court  
19 order, to extend the time within which to answer or otherwise respond to the complaint” so long as  
20 “the change will not alter the date of any event or any deadline already fixed by Court order”;

21 WHEREAS, the Parties have met and conferred and agreed to extend the deadline to move or  
22 otherwise respond to the operative Complaint to April 30, 2021, or, if the transfer motion is granted,  
23 until the date by which the transferee judge orders Defendants to move or otherwise respond to the  
24 Complaint, whichever is later;

25 WHEREAS, Defendants do not waive, and expressly reserve, all available defenses and  
26 challenges to jurisdiction; and

27 WHEREAS, such a stipulated extension would be without prejudice to Plaintiff.

28 NOW THEREFORE, the Parties stipulate that:

- 1 1. Defendants' deadline to move or otherwise respond to the operative Complaint shall
- 2 be extended to April 30, 2021, or, if the transfer motion is granted, until the date by
- 3 which the transferee judge orders Defendants to move or otherwise respond to the
- 4 Complaint, whichever is later.
- 5 2. The Parties may stipulate to a further extension of time to move or otherwise respond
- 6 to the operative Complaint in this action.
- 7 3. Nothing herein shall prevent Defendants from moving for additional time to move or
- 8 otherwise respond to the operative Complaint.

1 Dated: March 10, 2021

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**ATTESTATION**

I, C. Brandon Wisoff, am the ECF User whose identification and password are being used to file this Stipulation. In compliance with Local Rule 5-1(i)(3), I attest that concurrence in the filing in this document was obtained from the above signatories.

Dated: March 10, 2021

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